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Exempt from filing fee pursuant to Government Code section 6103

**UNITED STATE DISTRICT COURT IN AND FOR
THE EASTERN DISTRICT OF CALIFORNIA**

AMIE CHAN, RYAN SMITH,

Plaintiffs,

vs.

CITY OF ROSEVILLE, OFFICER
FRANKLIN, OFFICER KOENIG, OFFICER
SANCHEZ, OFFICER HANCOCK, DOES 1-
30,

Defendants.

Case No.: 2:25-cv-00975-DJC-CSK

**STIPULATION FOR EXTENSION OF TIME TO
FILE RESPONSIVE PLEADING AND OTHER
MATTERS; ORDER**

Compl. Filed: 3/28/2025
Trial Date:

Plaintiffs AMY CHAN, and RYAN SMITH (collectively “Plaintiffs”) and Defendants CITY OF ROSEVILLE, OFFICER FRANKLIN, OFFICER KOENIG, OFFICER SANCHEZ, and OFFICER HANCOCK (collectively “Defendants”) (Plaintiffs and Defendants collectively referred to as “the parties”), by and through their respective counsels of record, hereby stipulate as follows:

1. The parties have explored the possibility of early settlement negotiations. To that end, Defendants have informally agreed to share documents related to the subject incident with Plaintiffs. Further, Plaintiffs contend obtaining Defendant Franklin’s deposition testimony is necessary to having productive settlement discussions.

2. The parties stipulate that Plaintiffs should be afforded leave to take Defendant Franklin's deposition as soon as the parties are available for the depositions, on a date to be mutually agreed upon by the parties.
3. The parties intend to schedule a mediation or settlement conference to occur in June 2025.
4. The parties stipulate it will promote efficiency for the parties and Court to extend the deadline for Defendants to file their respective responsive pleadings to Plaintiffs' Complaint until after a mediation or settlement conference is completed. Thus, the parties stipulate Defendants' deadline to file their respective responsive pleadings should be extended to July 21, 2025.

IT IS SO STIPULATED.

Dated: April 18, 2025

PORTER SCOTT
A PROFESSIONAL CORPORATION

By: /s/ William E. Camy
William E. Camy
Attorney for Defendant CITY OF
ROSEVILLE, OFFICER KOENIG,
OFFICER SANCHEZ, OFFICER
HANCOCK

Dated: April 16, 2025

LAW OFFICE OF JOSEPH DAVID MANUEL

By: /s/ Joseph David Manuel
Joseph David Manuel
Attorney for Plaintiffs

Dated: April 15, 2025

ANGELO, KILDAY & KILDUFF, LLP

By: /s/ Derick E. Konz
Derick E. Konz
Attorney for Defendant OFFICER
FRANKLIN

ORDER

Having reviewed the foregoing stipulation, and good cause appearing, the Court hereby orders as follows:

1. Plaintiffs are granted leave to obtain the deposition of Defendant Franklin as soon as the parties are mutually available.
2. The deadline for Defendants to file their respective responsive pleadings to Plaintiffs' Complaint is extended to July 21, 2025.

IT IS SO ORDERED.

Dated: April 18, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE